

THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

JONATHAN LANGLEY §
Plaintiff §
§
v. § CASE NO. 1:18-CV-00443-LY
§
INTERNATIONAL BUSINESS MACHINES §
CORPORATION §
Defendant §

JOINT STIPULATIONS AND MOTION FOR LEAVE

TO THE HONORABLE JUDGE OF SAID COURT:

I.

The parties in this action, Plaintiff Jonathan Langley (“Langley”) and Defendant International Business Machines Corporation (“IBM”), through their respective counsel submit the following joint stipulation and motion for leave in connection Plaintiffs Response to IBM’s Motion to Strike Supplemental Report of Daniel Kuang (Docket No. 140).

II.

The parties, having conferred and hereby jointly agree to extend the deadline for Plaintiff Langley to submit a Response to Defendant IBM’s Motion to Strike Supplemental Report of Daniel Kuang (Docket No. 140) to Tuesday, August 6, 2019.

Prayer For Relief

WHEREFORE, PREMISES CONSIDERED, the Parties respectfully request leave of this Court to extend the deadline to respond to Defendant IBM’s Motion to Strike Supplemental Report of Daniel Kuang (Docket No. 140) to Tuesday, August 6, 2019, and for all further relief to which they may justly be entitled.

Dated: July 30, 2019

Respectfully submitted,



Heidi A. Coughlin
State Bar No. 24059615
Archie Carl Pierce
State Bar No. 15991500
Blair J. Leake
State Bar No. 24081630
Brantley Ross Pringle, Jr.
State Bar No. 16330001
WRIGHT & GREENHILL, P.C.
900 Congress Avenue, Suite 500
Austin, Texas 78701
512/476-4600
512/476-5382 (Fax)
HCoughlin@w-g.com
CPierce@w-g.com
BLEake@w-g.com
RPringle@w-g.com

*Attorneys for Plaintiff
Jonathan Langley*

Dated: July 30, 2019

JONES DAY

By: /s/ Joanne Bush

Joanne Bush
jrbush@jonesday.com
JONES DAY
717 Texas Ave., #3300
Houston, TX 77002

Matthew W. Lampe*
JONES DAY
250 Vesey Street
New York, NY 10281
212-326-7838
212-755-7306 – fax
mwlampe@JonesDay.com

*Admitted Pro Hac Vice

Alison B. Marshall*
JONES DAY
51 Louisiana Ave., N.W.
Washington, DC 20001
202-879-7611
202-626-1700 – fax
abmarshall@jonesday.com

*Admitted Pro Hac Vice

Brian M. Jorgensen
Texas Bar No. 24012930
JONES DAY
2727 North Harwood Street
Dallas, TX 75204
214-969-3741
214-969-5100 – fax
bmjorgensen@jonesday.com

**ATTORNEYS FOR DEFENDANT
INTERNATIONAL
BUSINESS MACHINES
CORPORATION**

CERTIFICATE OF SERVICE

I hereby certify that on July 30, 2019, I electronically filed the foregoing Joint Stipulation with the Clerk of Court using the CM/ECF system, which sent notification of such filing to the Court and all counsel of record.



Heidi A. Coughlin